September 3, 2008



Indiana Economic Development Corporation

One North Capitol, Suite 700 Indianapolis, Indiana 46204 Tel 317.232.8800 Fax 317.232.4146 www.iedc.in.gov

Barbara McNutt Chief Counsel Indiana Professional Licensing Agency

Dear Ms. McNutt:

Pursuant to IC 4-22-2-28, The Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small businesses associated with rule changes proposed by the Indiana Professional Licensing Agency ("IPLA") on behalf of the Indiana Plumbing Commission ("Commission") and contained in LSA Document 08-538. The proposed rule amends 860 IAC 1 and 860 IAC 2 to make changes to the administrative code that regulates the examination and reexamination for journeyman plumbers and plumbing contractors. The changes include revising the fee schedule to facilitate the outsourcing of the administration and scoring of the examinations for journeyman plumbers and plumbing contractors and establishing that fees be paid directly to the examination services rather than to the commission and to establish requirements for the reinstatement of a delinquent or lapsed license. The change also revises the requirements for admission to the journeyman plumber and plumbing contractor examination. Commission records indicate that there are 20 plumbing apprentice schools that meet the definition of small business under IC 4-22-2-28 that will be impacted by this rule.

The costs incurred by affected plumbing apprentice schools as result of this proposed rule come from the cost for the administration of the practical exam, which is estimated to be \$100.00 per examinee. The estimated number of examinees, based upon the number of examinees in calendar year 2007 is 2,808. The estimated total cost for all fees is \$280,800. Any increase in fees for the cost of administering the exam will be paid to the examination service or as an increase in tuition to schools. There is no new reporting or record keeping requirements for small businesses as a result of this proposed rule.

The IEDC does not object to the economic impact to small businesses associated with the proposed rule. The cost to small business can be offset by an increase in tuition. Additionally, the IPLA is required to set fees at a level necessary to cover the costs of its boards and commissions. The proposed rule was determined to be the fairest and most cost effective means of carrying out the IPLA's duties.

If you have any questions about the comments contained herein please contact me at 233-8962 or <a href="mailto:rasberry@iedc.in.gov">rasberry@iedc.in.gov</a>.

Regards,

Ryan Asberry

Assistant Vice President